

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ROGER KNOX,

Defendant

Criminal Action No. 18-cr-10385-NMG

**ASSENTED TO MOTION OF DEFENDANT
ROGER KNOX TO MODIFY APPEARANCE BOND**

Defendant Roger Knox ("Knox"), with the assent of the United States of America, respectfully moves to modify the Appearance Bond entered into pursuant to the Order Setting Conditions of Release in this matter dated April 2, 2020, by removing David and Lorien Moore of 1 Penny Lane, Lexington, Massachusetts (the "Moore's")(the "Lexington Property") as sureties and the Lexington Property as security to secure Knox's compliance with the Appearance Bond and to substitute therefor three unencumbered properties owned by Knox in the United Kingdom. In support of this motion, Knox states as follows:

Substitution of Security

1. In April 2020, Knox was released from custody on bail conditions set forth in an Order Setting Conditions of Release dated April 2, 2020 (the "Order"). Pursuant to the Order, Knox executed a personal bond in the amount of \$750,000 secured by an agreement between the Moores and the United States Attorney by which the Moores agreed to act as surety and to forfeit a \$750,000 interest in the Lexington Property should Knox fail to abide by the terms of the Order.
2. In the 19 months that Knox has been released he has never violated the terms or conditions of his release.
3. For personal reasons, the Moores are seeking access to the equity in the Lexington Property and, therefore, a release from their obligations as surety under the Appearance Bond.
4. Knox is the registered owner of three real properties located in the United Kingdom: 83 Hawthorne Crescent, West Drayton, UK; 22 Bridge Road, Uxbridge, UK; and 9 Moyrath House, Hawthorne Gardens, Belmont Road, Belfast, UK (collectively, the "UK Properties"). The UK Properties are completely unencumbered and have a combined estimated value of \$1,102,493. Knox has agreed to (a) execute and record in the appropriate UK registry mortgages on the UK Properties as security for Knox's satisfaction of his obligation to pay \$750,000 under the Appearance Bond and as

Motion allowed. JMM/Gorton, USDJ 11/16/2021